

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

DONALD J. TRUMP FOR
PRESIDENT, INC., *et al.*,

Plaintiffs,

v.

KATHY BOOCKVAR, in her capacity
as Secretary of the Commonwealth of
Pennsylvania, *et al.*,

Defendants.

No. 20-CV-02078-MWB

**DECLARATION OF MICHELE D. HANGLEY IN SUPPORT OF
ALLEGHENY COUNTY BOARD OF ELECTIONS, CHESTER COUNTY
BOARD OF ELECTIONS, MONTGOMERY COUNTY BOARD OF
ELECTIONS, AND PHILADELPHIA COUNTY BOARD OF ELECTIONS'
MOTION TO DISMISS THE COMPLAINT OR, IN THE ALTERNATIVE,
TO DISMISS PENDING STATE-COURT RESOLUTION
OF STATE-LAW QUESTIONS**

I, Michele D. Hangley, declare that:

1. I am a shareholder of the law firm of Hangley Aronchick Segal Pudlin & Schiller, counsel for Defendants Allegheny County Board of Elections, Chester County Board of Elections, Montgomery County Board of Elections, and Philadelphia County Board of Elections in this action. I make this declaration in support of Defendants' Motion to Dismiss the Complaint or, in the Alternative, to Dismiss Pending State Court Resolution of State-Law Questions.

2. Attached as Exhibit 1 is a true and correct copy of an Order, *In re Mot. for Injunctive Relief of Northampton Cnty. Republican Comm.*, No. C-48-CV-2020-6915 (Northampton C.C.P. Nov. 3, 2020).

3. Attached as Exhibit 2 is a true and correct copy of a Petition, *Donald J. Trump for President, Inc. v. Bucks Cnty. Bd. of Elections*, No. 2020-05627 (Bucks C.C.P. Nov. 3, 2020).

4. Attached as Exhibit 3 is a true and correct copy of a transcript dated November 10, 2020, *Donald J. Trump for President, Inc. v. Montgomery Cnty. Board of Elections*, No. 2020-18680, Montgomery County C.C.P.,

5. Attached as Exhibit 4 is a true and correct copy of an Order Withdrawing Petitioner's Oral Motion in *In re Canvassing Operation*, No. 201107003-Tsai (Phila. C. C. P. Nov. 3, 2020).

6. Attached as Exhibit 5 is a true and correct copy of an Order, *In re Canvassing Operation*, No. 201107003-Tsai (Phila. C. C. P. Nov. 3, 2020), D.E. 2.

7. Attached as Exhibit 6 is a true and correct copy of an Opinion, *In re Canvassing Operation*, No. 201107003-Tsai (Phila. C. C. P. Nov. 4, 2020), D.E. 6.

8. Attached as Exhibit 7 is a true and correct copy of the Memorandum of Donald J. Trump for America, Inc in Opposition to Pls' Mtn. for Preliminary Injunction, No. 16-6287, Dkt. 38, at 22-23 (E.D. Pa. Dec. 8, 2016).

9. Attached as Exhibit 8 is a true and correct copy of a transcript of the

November 5, 2020 Hearing in *Donald J. Trump for President, Inc. v. Phila. Cnty. Bd. of Elections*, No. 20-cv-5533 (E.D. Pa.).

10. Attached as Exhibit 9 is a true and correct copy of an Order, ECF No. 5, in *Donald J. Trump for President, Inc. v. Phila. Cnty. Bd. of Elections*, No. 20-cv-5533-PSD (E.D. Pa. Nov. 3, 2020).

11. Attached as Exhibit 10 is a true and correct copy of *Press Release: Patrick offers up to \$1 Million in Rewards for Voter Fraud Whistleblowers & Tipsters, Texans for Dan Patrick*, <https://www.danpatrick.org/patrick-offers-up-to-1-million-in-rewards-for-voter-fraud-whistleblowers-tipsters/?fbclid=IwAR2gWbGwdo1wwtmKzfFMQgjGEvp5uzrrmugenZcdy5gPPCytRsAyo8NiP3A> (last visited Nov. 11, 2020).

12. Attached as Exhibit 11 is a true and correct copy of Pa. Dep't of State, *Pennsylvania Guidance for Mail-in and Absentee Ballots Received from the United States Postal Service after 8:00 p.m. on Tuesday, November 3, 2020* (Oct. 28, 2020), available at <https://www.dos.pa.gov/VotingElections/OtherServicesEvents/VotingElectionStatistics/Documents/2020-10-28-Segregation-Guidance.pdf>.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 12, 2020.

/s/ Michele D. Hangley